

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

WILLIAM WALSH

VS.

PITNEY BOWES, INC.

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C.A. NO. 08-116L

PLAINTIFF'S STATEMENT OF THE CASE

The plaintiff, William Walsh, commenced employment with Ibis Consulting, Inc. ("Ibis") as a Business Development Executive in 2001. In 2003 the plaintiff was promoted to Director of Business Development. Pursuant to an agreement the plaintiff was paid a base salary plus commissions.

In 2006 Pitney Bowes acquired Ibis. Ibis was integrated under the Pitney Bowes Management Services, Legal Solutions Division. After the acquisition the plaintiff's salary and commission remained the same.

When certain commitments made by David Hutchinson, President of Pitney Bowes Management Services, Legal Solutions Division proved to untrue the plaintiff resigned his position with the defendant on September 14, 2007.

This claim is to recover those commissions that the plaintiff alleges is due and owing under his salary and compensation agreement/plan. The claim is outlined as follows:

Payment on open Pitney Bowes/Ibis Accounts	\$ 50,000.00	(Based on an estimate of \$5,000,000 in accounts receivable)
Project work billed as a result of the plaintiff's position (project continuation items)	\$ 100,000.00	(Based upon \$5,000,000 projected continuations)

Compulit Division sales \$ 60,000.00
between July 2007 and
September 2007 (2% of
approximately \$3,000,000)

Compulit Division project \$ 70,000.00
continuations (2% of
approximately \$3,500,000)

Total: \$ 280,000.00

Constructive Discharge To be determined

CARROLL, KELLY & MURPHY

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CERTIFICATION

I hereby certify that on June 10, 2008, a true copy of the within document was filed electronically and is available for viewing and downloading from the ECF system and that Lynn A. Kappelman, lkappelman@sayfarth.com; Sheri L. Pizzi, spizzi@taylorduane.com and Angela L. Carr, acarr@taylorduane.com will receive notice through the ECF system.

/s/ C. Russell Bengtson